

Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
Washington, D.C. 20554

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In the Matter of:

Framework for Next Generation 911  
Deployment

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PS Docket No. 10-255

**COMMENTS OF MOTOROLA SOLUTIONS, INC.**

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## **EXECUTIVE SUMMARY**

NG911 will be a paradigm shift in emergency communications that connects citizens, PSAPs, emergency responders, and other relevant entities through a robust, all-IP network enabling sharing of information and multimedia content on a level that was inconceivable when the legacy 911 system was designed and implemented. Motorola Solutions has been deeply involved in all aspects of the technical and standards development effort, and is committed to helping to realize a smooth and efficient NG911 transition. Achieving this goal will take more than developing new technologies. The NG911 transition demands careful and comprehensive planning at all levels of government and the dedication of significant intellectual and financial resources. The NG911 transition will take time, but with appropriate leadership and coordination, the public benefits will be substantial.

The NG911 standards-development process is entering the advanced stages, and thanks to the collaborative effort between standards groups, public safety, service providers, and technology developers, many of the key requirements and designs have been completed. However, significant technical challenges remain to be addressed, on both the public safety and commercial sides of the equation. Ultimately, when completed, NG911 systems should be able to receive communications from citizens using a variety of communications media, and they should feature open interfaces that enable future development.

Beyond the technical aspects, however, there are several key issues related to the NG911 transition that must be addressed to ensure a smooth deployment.

- Foremost among these concerns is the need to identify a secure source of funding for the development, implementation, and ongoing maintenance of the NG911 system. As the Commission itself recognizes, without secure funding “there can be no effective 911 service.”

- The NG911 system must be based upon uniform, open standards that will promote competition and enable economies of scale. The Commission should also consider opportunities to ensure that necessary intellectual property rights are licensed on reasonable and nondiscriminatory terms.
- The new technologies and media supported by NG911, and the new entities involved, pose serious questions about potential liability that must be addressed before PSAPs, commercial providers, and service providers will fully commit to the transition.
- Similarly, NG911 systems will enable the collection and sharing of medical and other personal information that will improve the efficiency of emergency services but also raise concerns about privacy and confidentiality. Ultimately, local emergency response agencies need to maintain control over how personal information is collected and disseminated.
- Finally, to promote the most effective use of the NG911 system, a comprehensive ongoing education and training effort will be required. This effort must be two-pronged, focusing both on disseminating information to the public about the capabilities of the new NG911 system, and emphasizing thorough training of PSAP workers and others to ensure that the system is used to its fullest.

Identifying appropriate solutions to these challenges is complicated by the uneven regulatory and jurisdictional landscape surrounding the 911 system. Although the determinations about the day-to-day operations of PSAPs and the specifics of the local NG911 deployments are most appropriately left to the judgment of local public safety authorities, certain aspects of the NG911 transition would most efficiently be managed at the state or federal levels. The Commission should closely examine the multijurisdictional nature of the 911 system and the limits of the authority and expertise of the various parties involved.

Motorola Solutions is committed to continuing to work with all parties to achieve the best possible emergency communications services for the American public. Motorola Solutions also appreciates the Commission's ongoing leadership on 911 and E911 issues. This Notice represents a step forward in the development and implementation of a NG911 system, and Motorola Solutions appreciates the opportunity to submit these comments.

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**COMMENTS OF MOTOROLA SOLUTIONS, INC.**

Motorola Solutions, Inc. (“Motorola Solutions”) hereby submits the following comments in response to the Federal Communications Commission’s (“FCC” or “Commission”) Notice of Inquiry about the ongoing efforts to develop and transition to a Next Generation 911 (“NG911”) system.<sup>1</sup>

**I. INTRODUCTION**

The deployment of NG911 will be a paradigm shift in emergency communications. NG911 will bring emergency services into the information age by converting 911 to an IP-based, software and database driven, networked service connecting citizens, public safety answer points (“PSAPs”), first responders, and other government or medical entities in a radically different way. When the standards are finalized and the technologies deployed, NG911 will dramatically expand the means by which citizens can contact emergency services, and it will enable PSAPs and first responders to access a wealth of new data and media types. These new capabilities will provide emergency responders with enhanced information, leading to improved efficiency, and, ultimately, saving lives.

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<sup>1</sup> See Framework for Next Generation 911 Deployment, PS Docket No. 10-255, *Notice of Inquiry*, 25 FCC Rcd 17869 (2010) (“Notice”).

The NG911 transition is also necessary to keep up with consumer expectations about the ability to request emergency services. Advanced communications technologies have been widely and enthusiastically adopted by consumers across the country. However, the 911 system has not kept pace with the evolution of communications technology. Existing circuit-switched 911 systems are generally unable to receive and transmit many forms of advanced communication. As recognized in the Notice, many consumers already mistakenly expect that they can contact 911 via SMS text messages.<sup>2</sup> Even for some communications that PSAPs can receive, such as interconnected VoIP and commercial mobile calls, the provision of accurate automatic location information (“ALI”) continues to be challenging. Ensuring that PSAPs can take advantage of the latest advances in technology and that citizens can effectively request emergency services over the most appropriate medium for them are two of the primary goals of the NG911 transition.

**A. Motorola Solutions Supports the Ongoing NG911 Development Efforts.**

NG911 is more than just an upgrade of existing 911 facilities. NG911 is a transition to an entirely new communications system that has necessitated a ground-up research, engineering, and development process involving standards bodies, public safety entities, telecommunications service providers, technology developers, and representatives of federal, state, and local governments. Thanks to the work of groups like the National Emergency Number Association (“NENA”), the Internet Engineering Task Force (“IETF”), the Alliance for Telecommunications Industry Solutions (“ATIS”), the 3<sup>rd</sup> Generation Partnership Project (“3GPP”), and the Organization for the Advancement of Structured Information Standards (“OASIS”), the standards development process is well under way. Many of the key technical and functional

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<sup>2</sup> See Notice at ¶ 41.

design documents related to the development of emergency services IP networks (“ESInets”) and the PSAP infrastructure required to support NG911 have been published, and other key standards-related documents are in the advanced stages of drafting.

However, key technical hurdles remain to be cleared—particularly with respect to the standards and techniques required by commercial networks and service providers. For example, as discussed in the record developed in response to the Commission’s recent *E911 Notice*,<sup>3</sup> a proven, cost-effective solution for routing SMS messages to the appropriate PSAP along with accurate location information has yet to be developed. However, Motorola Solutions appreciates the importance of non-voice communications to all persons, including those with disabilities. As such, Motorola Solutions supports efforts to evaluate interim solutions for providing emergency communications over SMS. This and similar technical challenges are being explored by the working group 4B of the Commission’s Communications Security, Reliability, and Interoperability Council, focused on the “Transition to NG9-1-1”. As it did in its comments on the *E911 Notice*, Motorola Solutions urges the Commission to fully consider the upcoming CSRIC Working Group 4B report in the context of this proceeding.

Motorola Solutions has actively engaged in the ongoing development efforts from both the public safety and commercial network perspectives. We look forward to continuing this collaboration with appropriate industry- and public safety-led bodies in the future. It is essential that uniform, nationwide standards emerge that are vendor neutral and create a level playing field to promote innovation. The technologies adopted must be advanced enough to accommodate all conventional forms of consumer communication and be “future-proof” enough to adapt to the

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<sup>3</sup> See Wireless E911 Location Accuracy Requirements, E911 Requirements for IP-Enabled Service Providers, PS Docket No. 07-114, WC Docket NO. 05-196, *Further Notice of Proposed Rulemaking and Notice of Inquiry*, 25 FCC Rcd 18957 (2010).

rapid pace of technology development. In particular, functionalities like real time video have the potential to radically improve first responder performance and coordination. One crucial input will be ensuring that as NG911 is deployed in PSAPs and communication centers, public safety broadband networks also develop with sufficient capacity, technology, and robustness to support these new functionalities.

**B. Appropriate Planning At All Levels Will Be Necessary To Ensure An Efficient NG911 Transition**

When standards development work is completed, significant intellectual and financial resources will have to be dedicated to developing and deploying the devices and infrastructure for public safety and consumers to take advantage of these advances. Careful and deliberate transition planning is critical as states and regions begin the arduous task of moving forward in a highly complex technical, operational, and regulatory environment. The transition to NG911 will not proceed uniformly across the country, and final implementations are likely to vary from place to place—while remaining consistent with the final standards—as public safety agencies deploy features and functionalities according to the needs of their local regions. Indeed, it is to be expected that some entities will begin implementing NG911 functionalities before all standards are finalized. These transitional approaches are appropriate and typical of how new technologies are introduced into the field. They serve an important function insofar as they provide the opportunity to demonstrate the viability of particular technologies or processes. However, regions adopting such transitional approaches must be prepared to align their deployments with the finalized standards in the future. Interoperability and some level of consistency will be essential to replicating the successes of the current nationwide 911 system.

Policy makers must understand that development and deployment of NG911 will take time, and different pieces will be ready on different schedules. Because of the variety of issues



that remain to be resolved, Motorola Solutions cautions against trying to place any firm timetables or deadlines on deployment. Apart from the technical aspects of NG911 deployment, there are a host of implementation concerns that must be effectively addressed by federal, state, and local lawmakers, as well as through close coordination with commercial providers, to ensure a smooth NG911 transition. Many of these issues are discussed in NENA's Next Generation 9-1-1 Transition Policy Implementation Handbook.<sup>4</sup> Among the policy issues identified in the NENA handbook are the challenges presented by differences between states in terms of 911 organization and resources; the need to identify secure funding for the NG911 transition; facilitating responsible sharing of 911 call and other emergency information between PSAPs and emergency responders consistent with privacy and confidentiality rules; and ensuring proper liability protection for the public and private entities involved in provision of NG911 services. It will also be necessary to establish a multifaceted education and training effort both to inform citizens about the capabilities of the new system and to train PSAPs and first responders on how to get the most out of the new NG911 infrastructure. These issues are discussed in more detail below, in response to the questions asked in the *Notice*.

## **II. RESPONSES TO QUESTIONS ASKED IN THE NOI**

### **A. NG911 Capabilities and Applications.**

In the *Notice*, the Commission asks several questions about the potential capabilities of NG911 systems, the applications that will run over these systems, and the architecture that will facilitate these functionalities.<sup>5</sup> As discussed above, the NG911 development processes are still

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<sup>4</sup> See National Emergency Number Association, *Next Generation 9-1-1 Transition Policy Implementation Handbook*, [http://www.nena.org/sites/default/files/NG911%20Transition%20Policy%20Implementation%20Handbook\\_FINAL.pdf](http://www.nena.org/sites/default/files/NG911%20Transition%20Policy%20Implementation%20Handbook_FINAL.pdf) (Mar. 2010) ("*NENA Transition Policy Handbook*").

<sup>5</sup> See Notice at ¶¶ 31-48.

ongoing in a variety of public safety, industry, and technical forums. Many of the functional requirements and expected capabilities of the NG911 system have already been determined, and Motorola Solutions refers the Commission to the work that has already been completed by NENA and others,<sup>6</sup> and the upcoming CSRIC Working Group 4B report, which will provide significant technical detail on these matters.

It is important that, when fully deployed, the NG911 system be capable of receiving emergency communications sent via popular consumer technologies like VoIP and text messaging. Beyond enabling new means of communication, these functionalities will be essential to ensure that the 911 system lives up to consumer expectations and that during times of emergency, when every second counts, citizens can successfully request emergency services on their first attempt and in the manner most appropriate to their situation and needs. In addition to supporting these widely deployed communications media, the NG911 system should be designed with an eye to incorporating ongoing development in technology. For example, one promising contemplated application is real-time video (“RTV”). Video capture capabilities are increasingly present in many contemporary mobile devices, in addition to security cameras and other technologies. With appropriate standards in place, PSAPs and emergency responders could be able to access any broadband enabled source of such content, providing a window to the scenes of emergencies that could make a major difference in terms of responder preparedness and efficiency.

One feature that could greatly accommodate the ability of the NG911 system to evolve with developments in technology would be open interfaces between applications and the underlying NG911 network. Open interfaces will permit ongoing development of new

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<sup>6</sup> See National Emergency Number Association, “NG9-1-1 Project”, <http://www.nena.org/ng911-project> (last visited Feb. 25, 2011).

functionalities, as application designers can ensure that new forms of content can be delivered effectively in a form that public safety entities can use. The Commission and the technical community should focus on identifying and developing such open solutions as a means of encouraging future experimentation and ongoing evolution.

**B. NG911 Network Architecture.**

The NG911 system will depend upon the availability of robust broadband resources, from the perspectives of both the commercial network operators and the public safety community. Commercial broadband network operators will have to support the transfer of significant amounts of new data during times of emergency, as multiple users are likely to call 911 simultaneously via advanced communications media. PSAPs will need to efficiently receive and process this data from multiple sources and distribute relevant information to first responders in the field. Thus, public safety broadband networks will be an essential component of the NG911 infrastructure that must be in place at the time of NG911 deployment. Because of the significant demands that will be placed on the network, local, state, and regional public safety entities should consider whether there would be benefits to coordinating their NG911 and public safety broadband network deployments to avoid any duplication of efforts, to ensure compatibility, and to best leverage shared resources. Of course, this should not result in any delay in the construction of a region's public safety broadband network.

As the Commission recognizes in the Notice, many potential media types and digital encoding formats could be used to support the NG911 network architecture. Motorola Solutions recommends that the Commission strongly encourage the adoption of industry-supported standards for the encoding of digital media such as streaming video or still images. By leveraging widely-supported industry standards, public safety entities can save development costs, best ensure interoperability with consumer devices as well as widely available video

surveillance equipment, and take advantage of the continuing evolution of technology in the commercial space.

The Commission seeks comment on the development of “virtual PSAP” arrangements as part of the transition to NG911.<sup>7</sup> Motorola Solutions believes that public safety agencies could potentially reap significant benefits in terms of increased redundancy and efficiency from the deployment of virtual PSAP arrangements. Such arrangements would allow for resources to be shared across a state or region when one PSAP is overloaded or disabled due to an extreme weather event or other major emergency. Also, increasingly cash-strapped local and state governments could use virtual PSAP arrangements as a way to consolidate PSAP resources and increase fiscal efficiency, by, for example, taking some PSAPs off of 24-hour operations and instead diverting their calls to another PSAP during non-peak hours. The technologies and standards necessary to facilitate this sort of virtual PSAP arrangements have not yet been finalized, however. Additional resources should be dedicated to development of this functionality, due to the significant increase in flexibility it affords to regional public safety authorities in organizing their operations.

### **C. Issues Related to NG911 Implementation/Transition.**

The Commission also seeks comment on “the potential operational, technical, and other challenges associated with the transition to NG911.”<sup>8</sup> Below, Motorola Solutions offers comment on several of the pending non-technical legal and policy issues that need resolution to help smooth the NG911 transition.

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<sup>7</sup> Notice at ¶ 56.

<sup>8</sup> Notice at ¶ 64.

## **1. The NG911 Transition Requires Secure Funding.**

One of the most important implementation challenges is the need to identify a secure source of funding for NG911 transition. Although the *Notice* purports not to deal with the question of NG911 funding,<sup>9</sup> the issue is nonetheless raised several times throughout the document. For example, the *Notice* correctly points out that without funding “for states, Tribes and local jurisdictions, there can be no effective 911 service.”<sup>10</sup> Also, the separate statements of Chairman Genachowski and Commissioner McDowell both recognize the importance of identifying sources of funding for NG911 implementation. The need to identify secure funding for the NG911 transition is too significant to be overlooked in this proceeding.

The NG911 transition will be a major undertaking for public safety agencies. Clearly, there will be significant costs incumbent in performing the major network infrastructure upgrades the transition will entail. However, beyond the core network, there will be a wide range of peripheral devices, processes, and applications that support and utilize the new NG911 infrastructure. For example, to ensure that advanced communications and new forms of information can be directed to responders in the field and other appropriate entities, PSAPs must deploy updated computer-aided dispatch (“CAD”) systems. Similarly, funding should be directed toward facilitating the seamless interconnection between 911, 311, and other municipal N11 numbers. This sort of interaction helps off-load non-emergency call traffic and increases overall efficiency. Sufficient funding needs to be identified to support the myriad hardware, software, training, and operational upgrades that the NG911 transition will require, as well as the

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<sup>9</sup> See Notice at n.22.

<sup>10</sup> *Id.* at ¶ 3.

broader public safety communications ecosystem that will be stimulated by the NG911 transition.

The funding issue is fundamental, because without security about the ongoing availability of transition funding, there is little incentive for anyone in the development chain to push new technologies to trial and to begin planning for the major deployments that will be necessary in the future. Although implementation costs will vary from region to region, it is a certainty that the NG911 will demand substantial resources above and beyond an agency's current 911 system budget, especially considering the implementation will have to take place concurrently with the ongoing operations of the existing E911 system. As standards efforts progress, it is expected that many jurisdictions will want to begin NG911 transition planning soon. It is crucial that the funding issue be addressed immediately.

The need to identify sufficient and secure funding is amplified by the regulatory situation within some states and local jurisdictions. In this time of nationwide budget shortfalls, some states have been reallocating money from 911 funds to other uses, reducing the availability of funding even for typical maintenance and system upgrades. Moreover, as NENA has previously pointed out, "[m]any existing laws, regulations, and tariffs specifically reference older technologies or system capabilities and consequently could be interpreted to prohibit the implementation or funding of IP-based 9-1-1 systems."<sup>11</sup>

The disparate funding models for 911 continue to be an obstacle. Funding is sometimes handled at the state level, and other times at the local level. In general, state, local, and Federal legislation and regulations should be crafted with the intent of being inclusive of the diversity of technologies and service providers that could potentially be involved in a NG911 deployment.

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<sup>11</sup> See Comments of the National Emergency Number Association at 18, GN Docket Nos. 09-47, 09-51, 09-137 (filed Nov. 12, 2009).

Furthermore, 911 funds must be secure. Funds and fees collected and monies appropriated for 911 need to be reserved only for use in connection with 911-related operations and development. The Commission should work with Congress and the states to ensure that funds are identified, secured, and appropriately used.

## **2. Uniform, Open Standards Will Promote Competition in the Provision of 911 Services.**

The Commission seeks comment on the competitive aspects of the market for 911 and NG911 services.<sup>12</sup> Looking forward, NG911 will provide the opportunity for increased competition among device and infrastructure manufacturers and service providers. Because NG911 will be a standards-based, all-IP system, the service will not necessarily need to be tied to a specific provider's network or vendor's product. However, as indicated above, to foster this competition, it is important that uniform standards and open interfaces be developed to promote interoperability, and that the technologies adopted be capable of adapting to and incorporating future evolution. Similar to in the case of funding, some local rules, regulations, tariffs, and laws will need to be modified to promote neutrality and inclusiveness with respect to technologies and service providers and to eliminate biases held-over from the switched-circuit era.

The Commission should also address the need for a policy on licensing of intellectual property ("IP") rights in relation to the provision of NG911 service. Provision of NG911 services may rely upon the licensing of certain IP rights, such as patents, copyrights, and trademarks in order to comply with Commission policies, NG911 standards, or other requirements. Service and commercial equipment providers required to license these rights may find themselves in an unfavorable bargaining position with respect to rights holders who seek to extract high licensing fees or place other restrictions on use of their IP. This situation could

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<sup>12</sup> See Notice at ¶¶ 67-70.

create disincentives for some service providers to embrace NG911, resulting in a delayed or uneven NG911 deployment. The Commission should address these concerns in this proceeding, and should consider options to ensure that IP rights that are essential to NG911 compliance are licensed on terms that are reasonable and non-discriminatory. In particular, the Commission should examine the sufficiency of the IP rights policies at the technical organizations involved in developing the NG911 standards.

**3. Appropriate Liability Protection Must Be Provided to the Public Safety and Commercial Entities in the NG911 Service Chain.**

Nearly as critical as identifying secure funding for NG911 is the need to provide appropriate liability protection to the public safety agencies and commercial entities involved in the delivery of NG911 services. As recognized in the *Notice*, the variety of different technologies and media with which NG911 systems may be able to interface creates a host of new liability concerns.<sup>13</sup> Federal, state, and local liability protections need to be examined and strengthened, where appropriate, to ensure that uncertainty about potential liability does not delay NG911 deployment.

Under current federal law, wireless carriers, VoIP providers, and “other emergency communications service providers” receive liability protection in their 911 activities to the same extent as a local exchange carrier under local statute, tariff, or judicial decisions.<sup>14</sup> This creates a patchwork approach wherein liability protections may vary between jurisdictions, frustrating the goals of a uniform national NG911 deployment. Because NG911 will provide for significant local customization with respect to the features and functionalities deployed, existing liability protections may need to be expanded to embrace new services and providers. NG911 will enable

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<sup>13</sup> See Notice at ¶ 72.

<sup>14</sup> See 47 U.S.C. § 615a.



different kinds of information sharing, call routing, and organizational structures that have the potential to challenge the scope of existing protections.

Concerns about potential liability are amplified by the jurisdictional questions raised in a NG911 ecosystem. Unlike the legacy 911 system, in which communications are largely originated and transited over networks managed by Commission licensees, many of the entities involved in NG911 communications may not fall under the Commission's jurisdiction. For a non-interconnected VoIP call placed over a mobile device operating on a private wi-fi network, it is not immediately clear over whom the Commission has jurisdiction sufficient to require compliance with its 911 rules. At a minimum, the Commission should address these significant jurisdictional questions as they pertain to potential liability issues.

National consistency in liability protection will be essential to encouraging investment and promoting a smooth NG911 transition. PSAPs will adopt technologies at different rates and make choices regarding the features to deploy based upon their resources, local needs, and expertise. Without sufficient liability protection to enable this flexibility, PSAPs and service providers will be hesitant to experiment with new technologies and services. As such, these questions regarding liability protection should be promptly addressed in advance of NG911 deployments to avoid any unnecessary delays.

#### **4. New NG911 Functionalities Raise Potential Confidentiality and Privacy concerns.**

The *Notice* correctly notes that the shared nature of the NG911 system presents new concerns about the amount of sensitive personal information that is being collected, accessed, and shared by and among public safety and emergency medical entities. NG911 systems will enable the collection of voice, video, and text data from an individual requesting emergency services, and will encourage the sharing of medical and other personal information with first

responders, hospitals, and potentially other government agencies where appropriate. While this information sharing has the potential to improve both individual responses and wider public health efforts, it is important that citizens feel secure that their rights to privacy and confidentiality will not be compromised as a result of seeking emergency assistance. Ultimately, local emergency response agencies need to maintain control over how personal information is collected and disseminated. Maintaining agency control of the information at the local level will help ensure a careful balance between what information is shared and the privacy concerns of civilians.

#### **5. Education About The Capabilities and Limitations of the NG911 System Will Be Key to Ensuring a Smooth Deployment.**

Appropriately, the Commission seeks comment in the *Notice* on the role of public information campaigns in the NG911 transition.<sup>15</sup> A comprehensive and multifaceted public education effort will be key to helping civilians understand the capabilities and limitations of the NG911 system. This education will have to be ongoing and keyed to the actual deployment of new services so that people know what functionalities will be available in their regions, and on what schedule they will be deployed. Beyond formal public education efforts, providers of next generation communications services need to clearly communicate to their users any limitations with respect to the ability to contact 911 for emergency services. Misunderstandings about the capabilities of the 911 system cost lives. As it becomes widely known that the transition to NG911 is underway, misinformation and confusion about the deployment details are likely to spread. Entities at the local, state, and federal levels all need to be thinking about how to disseminate accurate information to the public.

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<sup>15</sup> See Notice at ¶ 78.

Significant training will have to be conducted on the PSAP level as well. NG911 represents an entirely new means for handling emergency communications. However, despite all the new technology, an effective 911 system will depend upon human beings using the system effectively and exercising good judgment with respect to emergency response. Unlike with any previous incremental upgrade of 911 equipment or functionality, 911 dispatchers will need to learn a variety of new processes and technologies. Without sufficient training and confidence, PSAP workers will, at best, fail to take full advantage of the new functionalities. At worst, complex new systems on which 911 workers have not been properly trained could lead to mismanagement of NG911 calls, with tragic results.

#### **D. Jurisdiction, Authority, and Regulatory Roles**

In the final section of the *Notice*, the Commission seeks comment on the interdependent layers of jurisdiction and authority that make up 911 governance.<sup>16</sup> As recognized in the *Notice*, the 911 regulatory landscape is far from uniform. Although Congress has given the Commission specific authority for certain aspects of the 911 system, most design, implementation, operation, and regulation of the actual activities of PSAPs is administered at the state or local level. Although this creates certain complications, particularly with regards to funding, as discussed above, local control best ensures that new technologies and processes are deployed by PSAPs in a manner appropriate for their local areas. Maintaining local agency control over local 911 operations is essential, as they have the best understanding of the needs, abilities, and resources of the local area.

While local control is important, however, there is also a need for uniformity in state and national governance of the 911 system. Coordinated governance at the state and Federal levels

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<sup>16</sup> See Notice at 83-86.

will help to ensure that NG911 deployments proceed in an interoperable, standards-based manner, and that 911 funds are distributed and used efficiently for 911 projects. Many of the implementation issues discussed above are appropriate for federal or state action. These governance bodies have broader authority, more resources, and wider perspective, each of which will be necessary to ensure consistent management and operation of the overall NG911 system. Similarly, guidance on issues related to funding and liability protection might appropriately come from the federal level.

### **III. CONCLUSION**

As the standards development processes move into the advanced stages, it is an appropriate time to begin planning for the nationwide NG911 transition. The technical work is well underway through collaborative efforts between public safety, technical organizations, telecommunications service providers, and developers of networks, devices, and applications. However, significant non-technical questions related to the NG911 transition remain to be answered. As the Commission continues its examination of this issue, it should seek to support the ongoing technological development by providing the certainty and security that will be needed to ensure an efficient NG911 deployment.

Respectfully submitted,

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